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8 *Attorneys for Defendant State of California*
(by and through the California Highway Patrol)
9 *[erroneously sued as "State of California"]*
and Michael Bell

10
11 IN THE UNITED STATES DISTRICT COURT
12 FOR THE CENTRAL DISTRICT OF CALIFORNIA
13
14

15 **EDGAR SOLIS,**

16 Plaintiff,

17 v.
18

19 **COUNTY OF RIVERSIDE; STATE**
OF CALIFORNIA; SALVADOR
20 **WALTERMIRE; and DOES 1-10,**
21 **inclusive,**

22 Defendants.
23

5:23-cv-00515-HDV-JPR

DEFENDANTS' WITNESS LIST

Date: October 8, 2024
Time: 10:00 a.m.
Courtroom: 10D
Judge: The Honorable Hernan
D. Vera
Trial Date: October 29, 2024
Action Filed: 2/02/2023

24 **TO ALL PARTIES, BY AND THROUGH THEIR ATTORNEY OF**
25 **RECORD:**

26 Defendants' California Highway Patrol and Michael Bell hereby serves the
27 following witnesses which may be called at during trial, and as a draft of
28

Defendants' Witness List. Defendants' reserve the right to supplement or amend this list.

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
M. Vargas, Lieutenant, CHP San Gorgonio Pass	Stationed at San Gorgonio Pass Area Office, Field Operations. Involved in post-shooting investigation and knowledge of Defendant Bell's tactical training.	45 minutes	45 min	
D. Harris, Sergeant, CHP San Gorgonio Pass	Stationed at San Gorgonio Pass Area Office, Field Sergeant and knowledge of Defendant Bell's tactical training.	45 minutes	45 min	
C. Hamilton, Lieutenant, CHP Border Division CIIT	CHP Critical Incident Investigation Team, Leader. Involved in CHP critical incident investigation of the incident involving use of force on Plaintiff.	1 hour	1 hr	
J. Kawanaka, Sergeant, CHP Border Division CIIT	CHP Critical Incident Investigation Team, Lead Administrative Investigator. Involved in CHP critical incident investigation of the incident involving use of force on Plaintiff.	45 minutes	45 min	
Daniel Moody, Detective	Riverside County Sheriff Department involved in the subsequent scene control or incident investigation and plaintiff's blood sample.	45 minutes	45 min	
J. Manjarrez, Detective	Riverside County Sheriff Department officials. Collected white bag of powdery	30 minutes	30 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	substance from plaintiff's car suspected fentanyl and blood sample.			
A. Dittfurth, Deputy	Riverside County Sheriff Department official involved in the incident investigation. Surveillance video from 642 Taschner Drive and plaintiff's firearm forensic analysis.	30 minutes.	30 min	
Daniel Cline, Deputy	Riverside County Sheriff Department official involved in the incident investigation, obtained pictures, DNA swab, and Scanner data.	20 minutes	20 min	
Jennifer Jerneagan, Lead Forensic Evidence Supervisor	Riverside County Sheriff Department officials involved in the incident investigation.	20 minutes	20 min	
Yesika Alvarado, Forensic Evidence Technician	Riverside County Sheriff Department official involved in the incident investigation. Captured pictures of scene, bullet holes and charted plaintiff's firearm.	40 minutes	40 min	
A. Carey, Forensic Services Bureau Technician	Riverside County Sheriff Department official involved in the incident investigation. Obtained pictures of scene and plaintiff in hospital and first aid supplies and clothing.	20 minutes	20 min	
Venderfees, Forensic Services Bureau	Riverside County Sheriff Department official involved in the incident	20 minutes	20 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
Technician	investigation. Obtained pictures of pursuit termination at 632 Taschner Drive and point of rest of plaintiff's car and carport damage.			
Esteban Carranza, Investigator	Riverside County District Attorney's Investigator involved in the criminal investigation of the incident.	30 minutes	30 min	
J. Gonzalez, Lieutenant	Hemet Police Department Officer responded to the area where Plaintiff fled and where shots were fired and involved in the subsequent scene control or incident investigation.	30 minutes	30 min	
D. Maddox, Sergeant	Hemet Police Department Officer responded to the area where Plaintiff fled and where shots were fired and involved in the subsequent incident investigation.	30 minutes	30 min	
G. Gomez, Detective	Hemet Police Department Officer involved in the incident investigation.	20 minutes	20 min	
Kristen Steward, M.S., D-ABFT-FT or Erin Crabtree, MS., D-ABFT-FT-Laboratory Director	Bio-Tox Laboratories Personnel involved in the testing and analysis of blood obtained from Plaintiff.	30 minutes	30 min	
Greg Meyer, Captain (Ret.)	Police Practices Expert will explain POST standards from basic law enforcement training and use of force tactics	2 hours	1 hr, 15 min – 1 hr 30 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	applicable to facts of this case.			
Parris Ward, Forensic Video Analyst	Forensic video/audio analyst. Will testify regarding his assessment of BWC footage and security cameras near the shooting location and information that can be derived in relation to incident shooting.	1 hour	45 min	
Ronald Kvitne, M.D.	Board certified orthopedic surgeon medical expert will testify about his review and analysis of plaintiff's medical records as they pertain to Plaintiff's injuries including further treatment.	45 minutes	30-40 min	
Michael Ritter, M.D.	Emergency Medicine expert will testify about his review and analysis of plaintiff's Toxicology drug results positive for methamphetamine and PCP and other medical records pertaining to Plaintiff's injuries.	1 hour	45 min	
Leslie Martinez, Resident at 614 North Hillmer	Resident of the property where the incident occurred who heard yelling and gunshots.	20 minutes	20 min	
Marlene Sue Biggs, Resident at 634 North Hillmer	Resident who observed 2-3 officers chase a male adult and heard gunshots	20 minutes	20 min	
Jose Jesus Rodriguez, Resident 623 North Hillmer Drive	Heard gunshots and heard suspect run through property perimeter and the officer chasing after him. Heard shouting	20 minutes	20 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	and the words "He's got a gun" followed by numerous gunshots			
Ana Rodriguez, Resident 623 North Hillmer Drive	Heard gunshots and heard suspect run through property perimeter and the officer chasing after him. Heard shouting and the words "He's got a gun" followed by numerous gunshots	20 minutes	20 min	
Liliana Rodriguez, Resident 623 North Hillmer Drive	Heard gunshots and heard suspect run through property perimeter and the officer chasing after him. Heard shouting and the words "He's got a gun" followed by numerous gunshots	20 minutes	20 min	
Pearo Rodriguez, Resident 603 North Hillmer Drive	Resident who provided surveillance video from camera mounted to front of residence	20 minutes	20 min	
Florina Maria Mandujano, Resident 603 North Hillmer Drive	Resident who provided surveillance video from camera mounted to front of residence	20 minutes	20 min	
Thomas Jordan, Resident 603 North Hillmer Drive	Resident who provided surveillance video from camera mounted to front of residence	15 minutes	15 min	
Richard Contla, Resident 622 North Taschner Drive	Resident who heard a crashing sound and observed the suspect jump over an east wall. Then heard one of the officers yell, "He's got a gun" followed by numerous gunshots and shouting. Mr. Contla recognized suspect,	30 minutes	30 min	

Witness's Name*, Title, Affiliation (If Relevant)	Summary of Testimony/Why Testimony is Unique	Direct Exam (Hours)	Cross Exam (Hours)	Dates of Testimony
	having seen him in the area before the incident.			
Kathy Lynn Cassel, Resident 632 North Taschner Drive	Resident of the area where the suspect collided with the Kia Sorrento causing damage to the Kia, support post for the parking stall awning and block wall	20 minutes	20 min	

Dated: September 9, 2024

Respectfully submitted,

ROB BONTA
Attorney General of California
NORMAN D. MORRISON
Supervising Deputy Attorney General

David Klehm

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Deputy Attorney General
Attorneys for Defendant State of California (by and through the California Highway Patrol) [erroneously sued as "State of California"] and Michael Bell

*Indicates that witness will be called only if the need arises.

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CERTIFICATE OF SERVICE

Case Name: **Edgar Solis v. County of Riverside, et al.** No. **5:23-cv-00515-HDV-JPR**

I hereby certify that on September 10, 2024, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

DEFENDANTS' WITNESS LIST

I certify that **all** participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on September 10, 2024, at Los Angeles, California.

J. Sissoy
Declarant

/s/ J. Sissoy
Signature

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